

CHARGE OF DISCRIMINATION
TIFFANY JACKSON
PAGE 1

I. Overview of Individual and Class Allegations

AK Steel Corporation has discriminated and continues to discriminate against me in the terms and conditions of my application for employment with them on the basis of my race, African-American, by denying me the opportunity to be hired while hiring equally or less qualified white employees and subjecting me to a racially hostile application process and other forms of discrimination. I believe that AK Steel Corporation's actions are part of a continuing pattern and practice of discrimination against African-American applicants for employment and employees, including but not limited to, denying applicants hiring opportunities while providing such opportunities to equally or less qualified white applicants and subjecting them to a racially hostile application process.

II. Statement of Facts

I filed an employment application with AK Steel in Ashland, Kentucky two times: in June 2001 and December 2001. The first time, I found out that AK Steel was hiring at the unemployment office, where I also filled out a job application. The second time, I learned from African-American AK Steel employee Rodney Causby that the plant was again accepting applications. Around October 2001, I attended a job fair in Portsmouth, Ohio. There, I obtained an application and spoke with a white AK Steel representative about current job openings. Although I had been hoping to obtain an office position, the representative, Susan Lester, told me that there were no office positions available. In approximately December 2001, along with my resume I sent the application (having indicated "any available" as the position for which I wished to be considered) via U.S. mail to AK Steel.

My work experience included five months of inputting client data into computer spreadsheet files as a data processor for Lester Telemarketing, approximately six months of calling businesses to secure magazine subscription renewals as a telemarketer for Lester Telemarketing, and my current position, an inventory coordinator for Liebert Corporation, an air conditioner manufacturer. In this capacity, I am responsible for keeping track (via a computer program and on-site checks) of parts shortages to insure that workers always have on hand the mechanical parts they need to construct the air conditioners we sell. I have held this position since around October 2000. In addition, I have a high school diploma. Furthermore, I have no felony convictions and am drug-free.

In May 2002, Susan Lester contacted me via telephone to schedule a time for me to come in and take AK Steel's qualifying exam. This test consisted of two parts: one on general aptitude which included questions on mechanical reasoning, math, reading comprehension and pattern recognition, and a personality test. The personality test's questions tried to figure out what kind of a worker the test taker would be. One had to select from "1" to "5" to indicate whether one strongly agreed, strongly disagreed, or felt somewhere in the middle about a given statement. For a statement such as "When I'm working on a problem, I hate to be interrupted by another person," I might have marked a "3," meaning that sometimes I don't like being interrupted and sometimes I don't mind.

**CHARGE OF DISCRIMINATION
TIFFANY JACKSON
PAGE 2**

I had taken these tests as part of my prior application as well. That time, I called Ms. Lester approximately four to five days after I took the test to find out how I had done. She told me that I hadn't passed but that I could come in and try again. Before I took the test for a second time, I checked out some books from the local library to help me study. These included study guides for the ACT and SAT exams. I also referenced an introduction to math book that I owned. Because of my familiarity with the test (from having taken it previously) and this preparation, when I completed the exam for a second time I thought that I had done very well on it. When I called Ms. Lester a few days later, however, she relayed to me the same message she had regarding my June 2001 application: "Sorry you didn't pass but maybe you can take it again or if we get a new test we'll call you." Since then I have had no contact with AK Steel. I have been employed by Liebert Corporation since October 2000, where I work as an inventory coordinator.

III. Statement of Discrimination

I believe that AK Steel Corporation has discriminated against me and continues to discriminate against me in the terms and conditions of my applications for employment with them on the basis of my race, African-American, in violation of the Civil Rights Act of 1964, as amended, because white applicants with fewer qualifications than me have been hired and I have not, and because I have been subjected to a racially hostile application process and other forms of discrimination and denied the right to apply for work in an environment free of racial discrimination.

I have been adversely affected by these discriminatory practices by being deprived of the equal opportunity to be hired. Such discrimination denies me and other African-Americans the right to be hired for positions for which we are qualified.

This systemic discrimination also adversely affects the status of African-Americans as employees by promoting and reinforcing racial stereotypes and bias in hiring.

IV. Statement of Classwide Discrimination on the Basis of Race

Based on my experiences, I believe that AK Steel Corporation has engaged and continues to engage in a pattern and practice of discrimination against its African-American applicants for employment and employees that denies them equal employment opportunities in ways including but not limited to the following: denying them hiring opportunities while providing such opportunities to equally or less qualified white employees and subjecting them to a racially hostile application process and work environment in which few other African-Americans are employed. This policy violates Title VII of the 1964 Civil Rights Act, 42 U.S.C. Section 2000(e), *et seq.*

**CHARGE OF DISCRIMINATION
TIFFANY JACKSON
PAGE 3**

I believe this policy has effected a class of black persons comprised of all past, present and future black applicants for employment with AK Steel. I believe that these discriminatory practices occur throughout AK Steel Corporation. I make this charge on behalf of myself and all similarly situated African-American applicants for employment and employees.

I declare under penalty of perjury that the foregoing is true and correct.

Date: * June 25, 02

* Tiffany Jackson
Charging Party (signature)